Data Communications Company

Data Services Provider (DSP)

Consultation on the revised delivery plan

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Table of Contents

1. Background and context....4
   1.1. The DSP Programme....4
   1.2. Direction to produce an updated LC13B plan for the DSP Programme....5
   1.3. Scope and structure of this consultation....6
2. Updated LC13B plan for the DSP Programme....6
   2.1. Future Service Management....7
   2.2. Systems Integrator....7
   2.3. Overall Delivery Approach....7
   2.4. DCC Connect Service Deployment....9
      2.4.1. DCC Connect Order Confirmation Begins....10
      2.4.2. DCC Acceptance Into Service....10
      2.4.3. DCC Connect Go-Live and SU Cutover Window....11
   2.5. Modular DUIS....12
   2.6. Smart Routing Gateway....12
   2.7. Future DSP....14
      2.7.1. Blueprint phase....14
      2.7.2. Detailed Design, Build & PIT....15
      2.7.3. Systems Integration Testing....15
      2.7.4. System Capacity Testing....16
      2.7.5. User Integration Testing....16
   2.8. Go-Live....17
   2.9. Device Migration....18
      2.9.1. Device Migration Design....18
      2.9.2. Device Migration Solution....18
      2.9.3. Migration of Devices....18
   2.10. Movement of Install & Commission....19
   2.11. Decommissioning of the As-Is DSP....19
   2.12. Regulatory change....20
   2.13. Customer journey and key engagement milestones....21
3. Dependencies & Assumptions....22
4. Risks & Opportunities....23
   4.1. Risks....23
   4.2. Opportunities....24
5. Next steps....24

6. Consultation questions and how to respond 25

7. Attachments 26

Appendix A – DSP delivery plan Milestones 27

Appendix B – DSP delivery plan-on-a-page 31

1. Background and context

1. This consultation sets out and seeks your views on the revised plan for the delivery of the Data Services Provider (DSP) Programme.

2. We are seeking your responses to the questions set out in this consultation by **17:00 on 3 October 2025**.

1.1. The DSP Programme

3. The DSP sits at the heart of the smart metering infrastructure, providing data services that connect Energy Suppliers to devices at their consumers' premises. The DSP Data System is a central facility that controls the flow of messages to and from smart metering equipment, with Service User (SU) organisations (e.g. Energy Suppliers, Network Operators, and Other Users) communicating via these central DSP facilities.

4. The contract for the current DSP solution (referred to in this document as 'As-Is DSP') is set to expire in 2028 and encompasses several different capabilities including but not limited to:

   a. Provision of gateway services (i.e. network connectivity) to connect SU and Service Providers (SPs) to the DSP in both production and test environments.

   b. The DCC User Interface Specification (DUIS) which sets out the structure of the messages that can be exchanged with the DSP.

   c. The Core DSP which provides message routing, anomaly detection, registration services, inventory management, DCC Key Infrastructure (DCCKI – which refers to the cryptographic certificates used within the Public Key Infrastructure framework of the DCC), Certification Authority (CA), security checking, logging and reporting, and a Smart Metering Key Infrastructure (SMKI) repository.

   d. A DCC Service Management System (DSMS) which supports DCC's service operation.

   e. A Systems Integrator (SI), which manages key elements such as change and testing to ensure the system functions optimally.

5. The DSMS capability is in the process of being disaggregated with a replacement service being delivered under DCC's Future Service Management (FSM) Programme. FSM is a separate programme to DSP, and the delivery plan for FSM has been consulted on separately. It is therefore not within the scope of this document and milestones relating to that programme are not included. The FSM solution is due to Go-Live on 21 March 2026 and is not a dependency for the delivery of the wider DSP solution.

6. DCC recently completed a Full Business Case (FBC) for a new DSP contract to reprocure a solution for the remaining capabilities within the existing contract. New contracts were signed with partner organisations in April 2025. A disaggregated approach was adopted, with different partner organisations providing the following capabilities:

   - Core DSP being delivered by IBM, which is currently in blueprint (high-level design) phase. This will include a new DCCKI Certification Authority (referred to as DCCKI2 in this document).
   - DCC gateway connections will be provided by VodafoneThree. This service is referred to as DCC Connect.
   - Modular DUIS capability provided by Netcompany. This is a change from the existing 'monolithic' design of DUIS in the As-Is DSP and is intended to introduce more flexibility for SUs.
   - DSP SI being provided by CGI.

7. The DSP Programme will encompass the implementation of these new capabilities, except for the SI capability which is already in operation. This includes the provision of new gateway connections, cutover of SPs and SUs to the new DSP solution via the Smart Routing Gateway (SRG) and the migration of devices from the As-Is DSP to the new DSP solution (referred to in this document as 'Future DSP'). More detail on these steps, the corresponding Milestones, and the impact on SUs is provided in Section 2.

1.2. Direction to produce an updated LC13B plan for the DSP Programme

8. On 9 November 2023, DCC consulted on its current plan to ensure continuity in the provision of data services with respect to Smart Metering Systems.[1] This was carried out following a direction issued by the Secretary of State on 24 July 2023 under Condition 13B of the Smart Meter Communications Licence (LC13B). DCC submitted its plan to the Department for Energy Security & Net Zero (DESNZ) (the Department) on 30 January 2024,[2] and this was subsequently approved by the Secretary of State on 9 February 2024.

9. Now that the DSP procurement has concluded, contracts have been signed and implementation plans have been agreed with DCC's partner organisations, the Department and DCC agreed that DCC should produce a new plan for the DSP programme. Consequently, the Department issued a further direction to DCC under LC13B on 26 June 2025 directing DCC to produce a new plan for the delivery of the DSP Programme.

10. The revised plan will need to set out the activities the DCC will need to undertake and the deliverables it will need to procure to enable continuity in the DSP Core element of the provision of data services, and the timeline and interim Milestones for these, showing the critical path to delivery. The plan should also show key interactions with other changes that DCC is progressing in timescales that affect the continuity of the DSP Core element of data services. It should also identify activities, deliverables and events deemed outside of DCC's control or upon which it is dependent to deliver the DSP Core element of data services.

11. DCC has been directed to submit its new plan to the Department by 31 October 2025 following appropriate consultation with SEC Parties.

12. The Milestones in this plan for the SRG are presented as indicative, subject to further scoping and a Change Request (CR) process. DCC does not anticipate that the Milestones for SRG will change significantly and is consulting on that basis. Any minor changes to the Milestones for SRG will be included in the final plan that is submitted to the Department in October 2025.

13. A Control Point (CP), CP4, has been added to the plan for November 2025 to mark the end of the blueprint phase (high-level design). This is the point at which the post-design phase of the plan can be fully validated, and any outstanding design assumptions will have been assessed and confirmed. DCC will provide confirmation of any changes to Milestones presented in this plan at the Implementation Managers Forum (IMF) and also confirm whether the Department and DCC consider that a further consultation based on those changes is required.

14. Further CPs have been added to key inflection points of the plan. This includes CP5 in December 2026, which will mark build completion for Programme Increment (PI) 4, where the functional development of the Future DSP will have been completed and further validity of future dates will be available. The final CP in the plan, CP6, has been added for August 2028 to confirm the implementation timelines for Modular DUIS. DCC is considering the criteria that will apply to changing Milestones at these CPs and more detail on these activities is included in Section 2 below.

[1] Consultation on the Revised Delivery Plan for Continuation of Data Services (DSP) | Smart DCC
[2] Conclusions on the Revised Delivery Plan for Continuation of Data Services (DSP) | Smart DCC

1.3. Scope and structure of this consultation

15. This consultation seeks your views on the proposed delivery plan for the DSP Programme. It is expected to be of interest to all SEC Parties. This document is structured as follows:

- Section 2 of this document covers our revised plan for delivery and includes details of the planned regulatory change (including consultations) and customer engagement.
- Section 3 lists the assumptions and dependencies which have informed this consultation.
- Section 4 contains the current view of key risks across the DSP programme.
- Section 5 lists the next steps for the consultation.
- Section 6 sets out the consultation questions that we are seeking your input on.
- Section 7 contains the attachments, including the question response form.
- The appendices of this consultation contain (A) the DSP plan Milestones, (B) and the DSP plan-on-a-page.

16. This consultation will close at **17:00 on 3 October 2025**. Following this, DCC will provide a report to the Department by 31 October 2025 containing its consideration of the responses and its conclusions on its proposed updated plan. DCC will publish this conclusions document on the DCC website.

2. Updated LC13B plan for the DSP Programme

17. DCC last consulted on an LC13B plan for the DSP Programme in December 2023 before the FBC and contracting with partner organisations was complete. The updated plan set out in this Section reflects the current contracted position with the new and existing partner organisations and is the result of extensive collaboration with those organisations during contracting and mobilisation. While CRs are still being considered as part of the blueprint phase, DCC does not consider that these will materially impact the plan presented in this consultation.

18. The plan set out in this document focuses on the activities that will take place on or after the expected submission date of this plan to the Department. There are activities taking place on the DSP Programme that are therefore not included. This includes:

- The build and test of the DCC Connect platform solution.
- The preparatory work on DCC Connect ahead of the new connections being ordered, installed and used.
- Customer engagement activities on DCC Connect and the DSP Programme prior to Autumn 2025.
- Delivery of the consultation on DCC Connect, covering the enduring and transitional SEC changes that will support this activity.
- The blueprinting of the Future DSP solution and the early work to develop Modular DUIS.

19. An initial review of external activity and systems, and their associated milestones, that have the potential to impact the delivery of the DSP plan has been undertaken and none have been identified at this time. DCC will continue to monitor this and provide updates to plans as required.

20. Early scoping of activities and milestones relating to the Incumbent DSP provider have taken place; for example, dependencies on device migration and decommissioning. Further work is required to define these milestones, their dates, and any relevant CRs, and these will be added at CP4 if they need to be communicated to SUs and SPs. DCC does not consider that these activities and milestones will materially impact the Milestones presented in this plan.

2.1. Future Service Management

21. The previous plan for the DSP Programme that DCC consulted on contained Milestones related to the delivery of a new DSMS which is now being delivered separately under the FSM Programme, for which there is a separate LC13B plan. All milestones related to the delivery of the FSM arrangements have therefore been removed from this plan.

2.2. Systems Integrator

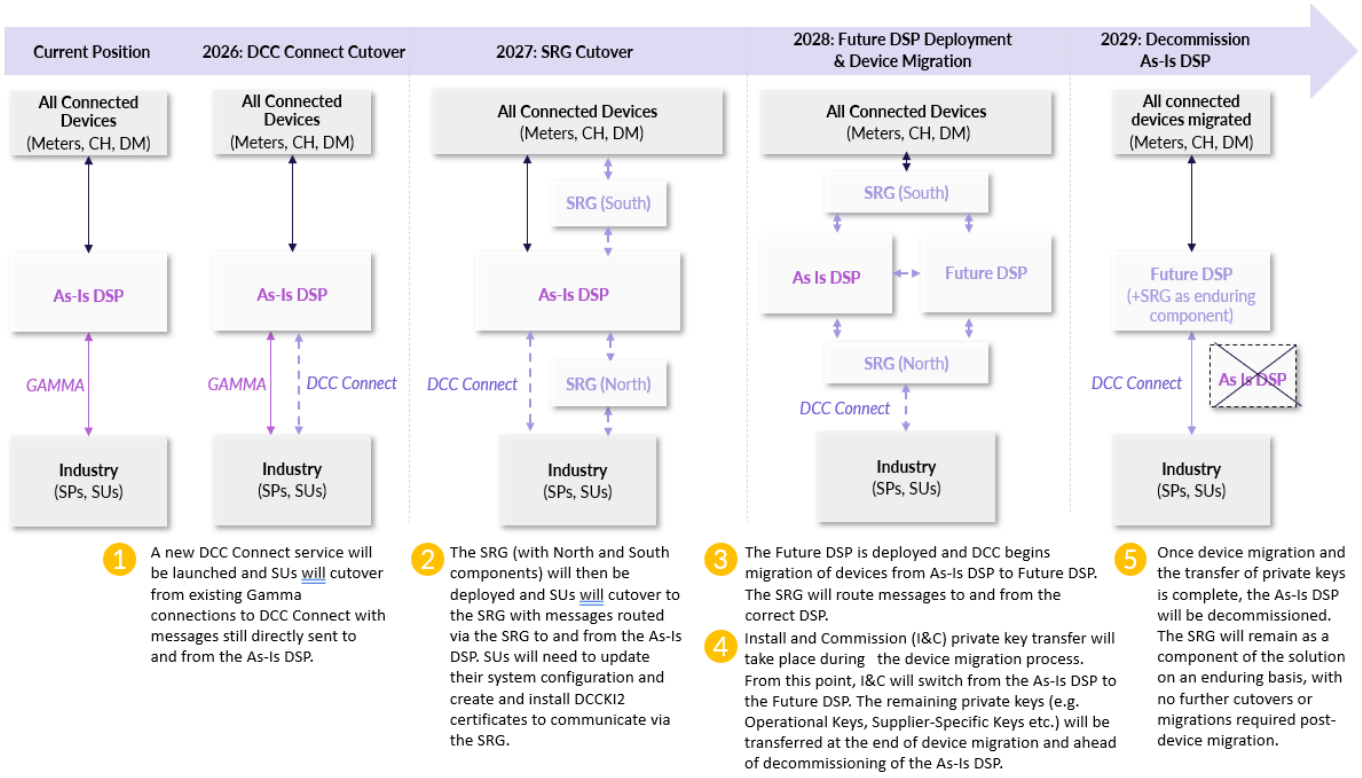
22. The previous plan for the DSP Programme that DCC consulted on contained Milestones related to the SI. The SI has now been appointed and mobilised, and all specific milestones related to the SI appointment have therefore been removed from this plan.

23. The role of the SI has expanded from that of the Incumbent DSP provider to the one that the SI has on the DSP programme, where the SI will be tasked with leading integration and design assurance, amongst other activities. The primary objective of the DSP SI is to ensure the DSP's transformation onto a platform that is secure, scalable, extensible, and elastic, thereby supporting the DCC's Licence and other obligations under the SEC. Specifically, it will provide independent technical assurance and coordination, management, and testing throughout the programme. In addition, the DSP SI will assist the DCC in the role as design authority for the Future DSP and also by providing project management services to help ensure that the DSP programme meets its timescales and plans.

2.3. Overall Delivery Approach

24. The approach to delivering the new capabilities and services for DSP will follow the high-level sequence of activities set out in the list and diagram below:

    1. A new DCC Connect service will be launched and SUs and Test Participants (TPs) will cutover from existing Gamma connections to DCC Connect with messages still directly sent to and from the As-Is DSP.
    2. The SRG (with North and South components, referring to the direction of data flow within the communication architecture of the Smart Meter System. South refers to the direction from central systems such as the DSP down to devices while North refers to the direction from devices back up to the DSP) will then be deployed and SUs will cutover to the solution with messages routed via the SRG to and from the As-Is DSP. SUs will need to update their system configuration and create and install DCCKI2 certificates to communicate via the SRG.
    3. The Future DSP is deployed and DCC begins migration of devices from As-Is DSP to Future DSP. The SRG will route messages to and from the correct DSP.
    4. Install and Commission (I&C) private key transfer will take place during the device migration process. From this point, I&C will switch from the As-Is DSP to the Future DSP. The remaining private keys used for communication with devices held by the As-Is DSP will then be transferred at the end of device migration and ahead of decommissioning of the As-Is DSP.
    5. Once device migration and the transfer of private keys is complete, the As-Is DSP will be decommissioned. The SRG will remain as a component of the solution on an enduring basis, with no further cutovers or migrations required post-device migration.



25. Therefore, there are three main activities which need to take place on the DSP programme, two of which will require involvement from SUs. To support the management of each activity, DCC is currently planning on the basis that all SUs, and TPs where required, will have completed each step before the next commences, and will support SUs and TPs to implement this approach in a timely manner. The three main activities are listed below:

    1. Cutover to DCC Connect from GAMMA connections – This represents a change for the entirety of the DCC ecosystem and as such DCC will prioritise the protection of the current service throughout the execution of this element of the plan. It is important that all SUs and TPs support and facilitate this activity with DCC. This will include: confirming the proposed DCC Connect connection type and costs; providing required technical information to provision the connection; agreeing dates for surveys, installations and cutover to DCC Connect; facilitating physical access to locations for DCC to undertake surveys and installation works; and planning and execution for live network traffic cutover. Further information on these activities is provided in Section 2.

    2. Cutover to the SRG from the As-Is DSP – SUs will need to make changes to their system configuration and create and install a new DCCKI2 test certificate in the User Integration Testing (UIT) environment ahead of UIT testing and in production once the SRG is live. Further information on the cutover to SRG, UIT and other testing activities is provided in Section 2.

    3. Migration of Devices from As-Is DSP to Future DSP – While DCC is not proposing active involvement from SUs for this migration in the live system, the approach to device migration is set out in Section 2, including information on UIT activities for device migration. I&C and other private key transfer will also take place during device migration.

26. The Device Migration phase will be similar to that carried out for the Enduring Change of Supplier (ECoS) programme. A migration solution will be created to carry out and report on progress of migrations which will be subject to Pre-Integration Testing (PIT) and Systems Integration Testing (SIT) phases and will be used as part of UIT. The reporting on progress of migration (both success and failure) will ensure message processing is both accurate and performs within service levels.

27. There will be a period of dual-running using both the As-Is DSP and the Future DSP. To minimise this period and the associated operational costs, DCC has adopted an approach to commence device migrations as early as possible. More detail on how we will deliver this approach is set out below, in particular later in Section 2 on the SRG.

28. The current plan includes a short period of dual-running between the expiry of the As-Is DSP contract (October 2028) and the end of device migration to the Future DSP (December 2028). A continuity of service clause in the As-Is DSP contract exists which means DCC can make use of a Termination Assistance Provision (TAP) to manage this period as required. The TAP can be up to 24 months long, which provides suitable schedule contingency should there be delays across the programme. DCC does and will continue to review progress against plan to minimise the need for this contingency.

29. The Sections 2.4 – 2.10 describe the delivery approach in more detail. Where applicable, relevant consultation questions have been included for reference and are then listed in full in Section 6.

2.4. DCC Connect Service Deployment

30. A new workstream with new milestones has been added to reflect the work required to deploy the DCC Connect service. This section also sets out the process for deploying DCC Connect for connections to both Production and Test Environments. DCC will work directly with Registration Data Providers (RDPs) to provide suitable connections in similar timeframes to the dates provided in this Section.

31. The deployment of DCC Connect will be done in the following stages, with more detail provided later in the Section on each step where required:

a) NETMAD Consultation and Designation – DCC is planning for SUs and TPs to cutover to the new solution in line with the rules that will be set out in SEC Appendix AU 'Network Evolution Transition and Migration Approach Document' (NETMAD). DCC will consult on the required changes and proposed service offerings for the new DCC Connect service starting in October 2025 and submit our conclusions to DESNZ by 12 January 2026. A Milestone for this date has been added to the plan. If DCC is able to submit its conclusions earlier, this may result in an earlier designation date of the NETMAD which will be communicated via relevant channels including SEC Sub-Committees. DCC will begin the data capture process with SUs and TPs during this stage.

b) DCC Connect Order Confirmation Begins – DCC currently has over 100 SU and SP connections in place with Gamma. To complete the transition of all these connections, and the TPs using Gamma connections, to the new DCC Connect service, DCC will be open for orders of DCC Connect on the first working day after the designation of the NETMAD (expected to be 26 January 2026 or earlier). A Milestone for this date has been added to the plan. On this day, the orders can start to be placed by both existing SUs and new SUs. This date allows for the lead time for the physical site surveys to be completed and equipment to be ordered and installed. This will mean that new connections can be tested and commissioned at the earliest date possible following the DCC 'Acceptance Into Service' (AIS). More detail on AIS is provided in the next step.

c) DCC Connect Acceptance Into Service – AIS is a DCC operational governance process that ensures that deployment and performance of new services meets operational acceptance standards. This will be an 'internal' decision for DCC to satisfy itself that the interconnectivity between the existing Gamma network and the new DCC Connect (VodafoneThree service) has been established successfully, and without adverse effect on the current operational service. To make this decision, DCC will conduct a series of tests with both the DSP and elements of the current SPs. DCC is planning on the basis that the AIS process will be completed by 24 March 2026. The AIS process includes the cutover of selected SPs, including the As-Is DSP, to further ensure no impact to operational service prior to an AIS decision.

d) DCC Connect Go-Live and Service User Cutover Window Begins – The opening of the cutover window will mark the 'external' Go-Live date i.e. the date by which SUs and TPs can begin cutover to DCC Connect once DCC has confirmed there is no risk to existing operational service and has signed off the AIS governance. The cutover window and external 'Go-Live' will therefore begin on 25 March 2026 and run for approximately 12 months until 30 March 2027, during which time DCC will support SUs and TPs with the cutover from Gamma to DCC Connect. Milestones relating to these dates have been added to the plan.

2.4.1. DCC Connect Order Confirmation Begins

32. Placing of orders will be completed via an order form and in-life management will be conducted via the existing DSMS. The NETMAD will set out this process in detail.

33. To facilitate understanding of the SEC changes that set out the new service and the supporting processes and charges, DCC is planning to undertake engagement with SUs and TPs in parallel to the NETMAD consultation period. DCC plans to continue this activity beyond designation and throughout 2026 to ensure all parties have a clear understanding of the required steps to support the installation of DCC Connect connections and the cutover.

34. Site surveys will be undertaken where necessary. Upon acceptance of an offer by the SU or TP for provision of the connection, new circuits will be provided, and installation of necessary hardware and network terminations will be carried out at SU and TP premises, in line with the process set out in the NETMAD.

35. Progress against the plan will also be reported to appropriate SEC Sub-Committees. More detail on customer engagement is provided later in Section 2 of this document.

2.4.2. DCC Acceptance Into Service

36. The DCC Connect solution will be delivered by VodafoneThree. A limited amount of development activity is required to integrate the service with DCC's Security Operations Centre (SOC).

37. PIT will cover test design, readiness checks, and execution (including VodafoneThree PIT and SOC/ Security Information and Event Management (SIEM) integration), governed by DCC's Test Assurance Board (TAB).

38. The PIT phase is limited to testing of the SOC interface. No SIT testing is planned as the service that DCC Connect uses is a managed service provided by VodafoneThree, with no integration with other DCC systems beyond the SOC interface being tested in PIT. Similarly, no UIT is planned as the change is being made to the network boundary only. These activities are therefore considered to be low risk.

39. Security assurance and penetration testing of the new SOC interface will take place ahead of Go-Live and will be subject to endorsement by the Competent Independent Organisation (CIO) and the Security Sub-Committee (SSC). A Chief Information Security Officer (CISO) letter will be submitted to the SSC ahead of Go-Live after completion of security testing and remediation.

40. Business Acceptance Testing (BAT) will be carried out to validate the end-end operational processes that will support the service in-life.

41. Implementation of the workflow changes will be via a configuration change to the existing DSMS solution which will be released during a low impact maintenance window. These changes will be rolled forward into the FSM solution at a point that minimises adverse impact to SUs, TPs and programme schedules, and DCC will provide SUs and TPs with more detail on that activity through relevant SEC Sub-Committees.

42. The DCC Connect SOC/SIEM internal commissioning will be determined by the DCC AIS process and will not be subject to formal Live Service Criteria (LSC). This is because the planned change is to the network boundary only. The AIS process for DCC Connect will consist of:

a. BAT – to assure end-end operational processes and that the service can be properly supported.

b. Service Acceptance – a series of checks to ensure that DCC is ready to Go-Live and support the new service.

c. Ongoing surveillance – AIS includes surveillance of the change post implementation, during which the quality and operability of the service changes are assessed.

43. Once the SOC/SIEM is commissioned, DCC will initiate the following essential key technical changes:

a. Establish a new Network-to-Network Interface that will connect the existing Gamma network to the new DCC Connect network.

b. Installation of dual circuits to provide increased bandwidth and resilience for the network switches of the As-Is DSP.

c. Cutover of at least one existing SP from Gamma to DCC Connect.

44. DCC will conduct a series of tests throughout AIS with both the As-Is DSP and some specific SPs to prove these changes are established without any adverse effect on the operational service. DCC will implement the ability to immediately rollback to Gamma connections should the cutover be unsuccessful. Once DCC is satisfied that there has been a suitable period of steady running beyond those changes, DCC will declare that the DCC Connect is Accepted into Service, with a provisional date of 24 March 2026.

45. Following AIS, DCC intends to phase the implementation of DCC Connect into all the other existing SPs through a series of High Impact Maintenance Windows (HIMWs)/outages. There is the potential for DCC will default to use existing planned HIMWs wherever possible, but DCC anticipate that there will be a need for additional HIMWs in 2026. DCC will use the appropriate process via SEC Panel and appropriate Sub-Committees to provide notice of these dates at the earliest opportunity.

2.4.3. DCC Connect Go-Live and SU Cutover Window

46. The opening of the cutover window will mark the 'external' Go-Live date i.e. the date from which SUs and TPs can begin cutover to DCC Connect once DCC has confirmed there is no risk to existing operational service and has signed off their AIS governance. It represents the earliest point by which existing SUs and TPs can be cutover from Gamma to DCC Connect and new SUs and TPs will have live DCC Connect connections. Specific cutover dates for new and existing SUs will be agreed as part of the order process and subject to DCC's AIS criteria.

47. Subject to their connections being in place, SUs and TPs will have the opportunity to commence cutovers on 25 March 2026 and DCC is planning for all SUs and TPs to cutover by 30 March 2027. DCC has planned for this activity to align with current forecast for SU and SP Gamma contract renewal dates and believes these activities are achievable within the planned timeframe. This includes cutover of the UIT for TPs and Production environments for SUs. Cutovers after this date are not being planned for in order to mitigate risks associated with an extended dual-running of DSP, including higher operational costs, should the DCC Connect cutover be delayed. DCC expects SUs and TPs to take all reasonable steps to meet the cutover date and will support SUs and TPs to do so. DCC is planning for the cutover to the new solution to be completed in line with the rules that will be set out in the NETMAD.

48. Once DCC is confident that the end-to-end process is proven then SUs and TPs will begin cutover. Old connections will then be decommissioned including recovery and secure disposal of hardware. Arrangements for this will be agreed with the SUs and TPs.

49. During the cutover to DCC Connect, DCC will need SUs and TPs to:

- provide accurate data relating to location of network terminations including confirmation that the necessary technical requirements are met (e.g. availability of rack space and power) which will be defined during the ordering process.
- facilitate access to premises for surveying (where necessary) and installation of network connections and termination equipment, as agreed during the ordering process.
- support cutover to the new DCC Connect service, working with DCC to undertake a technical network traffic cutover involving technical and operational teams. This requirement applies to both test and production environments.

Q1	Do you agree with the proposed Milestones for the DCC connect cutover and associated dependencies on SUs and TPs? *Please provide a rationale for your response.*

2.5. Modular DUIS

50. Modular DUIS is a capability being provided by Netcompany and reflects a change from the existing 'monolithic' design of DUIS in the As-Is DSP and is intended to introduce more flexibility for SUs. The benefits to SUs from this new solution compared with monolithic DUIS include:

- Scalability and future proofing – Modular DUIS supports 'plug-and-play' type upgrades meaning new features can be added as independent modules without disrupting the core system.
- Improved maintenance – Issues can be resolved in isolated modules without impacting the entire system and avoiding a full redeployment.
- Cost efficiency – Monolithic DUIS typically has higher operational costs due to full system overhauls while modular DUIS only requires updates to necessary modules.

51. A decision has been taken to implement modular DUIS on Future DSP only, rather than also implementing the solution on As-Is DSP, as was originally planned. This decision not to include modular DUIS on As-Is DSP was made based on an analysis of the proposed benefits, which identified that the benefits (which were mainly for new SUs) were not significant and did not outweigh the costs. Because the As-Is DSP will only support monolithic DUIS, and it will not be possible for a SU to determine which DSP any given device will be aligned to, SUs will only be able to use modular DUIS once all devices are migrated to the Future DSP, which concludes 15 December 2028, as this will support both monolithic and modular DUIS.

52. A control point milestone (CP6) for 30 August 2027 has been added to the plan associated with the new modular DUIS, at which point DCC will have more information on potential costs and timelines to implement it. DCC intends to consult on any changes required to implement modular DUIS on the Future DSP. The timelines for this regulatory consultation will also be confirmed at CP6.

53. DCC has undertaken preliminary work to design the modular DUIS solution for Future DSP and will update and publish these designs when the plan to implement the modular DUIS service has been agreed. DCC will continue to engage with customers at relevant SEC Sub-Committees and the consultation outlined above to communicate and refine the designs.

2.6. Smart Routing Gateway

54. DCC has proposed a SRG service that would intercept all messages to and from SUs and route them to either the As-Is or Future DSP, depending on whether migration to the Future DSP has taken place yet. The SRG will have two components to route North and South traffic from the DSP. The North component will receive and send messages from SUs, most SPs and management traffic from Communication Service Providers (CSPs) to the DSP. The South component will

receive and send messages to SPs from the DSP. DCC's intent is to deploy the SRG in a standalone release (which will include both the North and South components) and for SUs to cutover to it ahead of the Future DSP going live in February 2028. IBM will be developing the SRG, and the benefits of this approach are outlined below:

- Service protection – The SRG will help ensure SUs get an equivalent service from either the As-Is or Future DSP as devices are migrated.
- Reduced risk during migration – By separating and expediting the SRG cutover from the Future DSP device migration, DCC would reduce the risk of overrun beyond 2028 and hence the cost of extending the dual running period of As-Is and Future DSP.
- Cutover flexibility – Implementing the SRG ahead of the Future DSP would allow more time and flexibility for SUs to cutover from the As-Is DSP.

55. One of the controls that will secure the traffic between SUs and the SRG will be via the use of a new DCCKI (DCCKI2) Certification Authority, which will be developed by IBM. The proposed steps that SUs will have to take to migrate to SRG are outlined below with more details to be provided at CP4:

1. SUs will be required to subscribe to DCCKI2, adding their public certificate and accepting the DCCKI2 certificate. This DCCKI2 process must be completed prior to an SU cutover to the SRG. SUs will install DCCKI2 certificate on their Policy Enforcement Points (PEPs).
2. SUs will then also have to change the Uniform Resource Locator (URL) for the DSP and EUI 64 (64-bit globally unique identifier governed by the Institute of Electrical and Electronics Engineers) target ID for messages targeting the DSP. SUs will be supported with this process by the DCC Service Management Team.
3. SUs will then need to make further changes to ensure that they can recognise the digital signature from both As-Is and Future DSP.

56. Once cutover is completed, the SRG will route messages to and from the appropriate DSP (i.e. the DSP hosting the devices that the SU is currently communicating with). DCC is planning on the basis that all SUs will have completed cutover to the SRG in advance of device migration. The SRG will then remain as a component of the solution on an enduring basis and will continue to direct traffic across the DSP system to support any future elective services and provide system flexibility.

57. This SRG release will have discrete PIT, SIT, UIT and Go-Live activities, separate from and in addition to those required for the release of the Future DSP in February 2028. The indicative Milestones for SIT and UIT have been provided below, and Milestones have been added to the plan. Explicit dates for PIT for SRG have not been included as DCC is planning on the basis that SRG will be tested in the Future DSP PIT window presented in this plan, and this will be confirmed at CP4.

58. The SRG release SIT window is from 15 March 2027 to 30 April 2027, which includes exit sign-off by the Panel as advised by TAG. The SRG will have a period of UIT prior to Go-Live where TPs can cutover their systems and begin testing of the SRG. The UIT window will open on 3 May 2027 and close on 28 May 2027. DCC will confirm at CP4 the date by which SUs will no longer be able to test in UIT without having first cutover to the SRG. DCC considers that this UIT window will be sufficient as this will be a one-off test activity that is optional and focused on connectivity.

59. Go-Live of the SRG will be subject to LSC governance, details of which will be set out by DESNZ. This LSC decision will cover the Go-Live for the SRG, the Go-Live of the new DCCKI Certification Authority (DCCKI2), and the beginning of cutover of SUs to the SRG, with short gaps between these points. This plan assumes that this process will be similar in nature to previous programmes and will require assessment by the SEC Panel Sub-Committees and a recommendation from the SEC Panel prior to a DESNZ determination. The plan sets out that the LSC document will be issued to DESNZ and SEC Panel for consideration on 10 July 2027 and that the conclusion of

service acceptance activities and subsequent Go-Live decision will take place on 23 August 2027. Milestones for these activities have been added to the plan.

60. The Go-Live for the SRG will be 25 August 2027. The cutover of SUs to the SRG will commence on 1 September 2027 and the cutover window is planned to end on 15 January 2028. DCC is planning on the basis that this window will be sufficient to cutover SUs to the SRG. Milestones for these activities have been added to the plan. DCC will continue to monitor this and will provide a further update ahead of the final submitted plan to the Department in October where possible.

61. DCCKI2 will Go-Live at the same time as the SRG Go-Live, which is detailed below. There will be a consultation on implementing the DCCKI Document Set for DCCKI2. DCC is planning for this consultation to be conducted in July 2026, and a conclusions document will be issued to DESNZ by 9 October 2026.

62. DCC intends to consult on the SEC requirements associated with SUs moving to communications via the SRG as part of a further consultation on updates to the NETMAD and any associated regulatory documents. The consultation will include information on the changes required by SUs. It will also include information on the timelines for these changes. DCC is planning for this consultation to be conducted in April 2026, and a conclusions document will be issued to DESNZ by 14 August 2026.

Q2	Do you agree with the proposed Milestones for the cutover onto the SRG and associated dependencies on SUs? *Please provide a rationale for your response.*

2.7. Future DSP

63. This section explains the phases of the Future DSP design, build and test, with reference to key milestones where appropriate.

2.7.1. Blueprint phase

64. High-level designs will be completed during an initial 'blueprint' phase which will include an end-end high-level design, a high-level test design, and a definition of six Programme Increments (PIs) during which detailed design, build and PIT of the Future DSP will take place incrementally. Detailed designs for the first PI will take place during the blueprint phase. The PIs will follow a cyclical pattern with the preceding PI delivering a detailed design and test plan while the current PI delivers a PIT test which will then be reviewed by the SI for integration and assurance purposes. The final scope for each PI will be confirmed at the end of the blueprint phase but the current approach to the scope of each is set out below:

- PI-1: Initial version containing limited Service Reference Variant (SRV) processing and limited alerts and retries, which includes inbound and outbound queue managers, Smart Metering Equipment Technical Specification 2 (SMETS2) Transformation, managing locations, registration, Hardware Security Modules (HSMs) tested on a small number of SRVs and associated alerts.
- PI-2: Extending the list of SRVs, Messaging Mapping Catalogue (MMC) and northbound message processing and extending SMI, queue and location managers, stream processing, reporting and DCCKI CA.
- PI-3: Comprehensive alert and retry processing together with non-functional test readiness.
- PI-4: Gateways that handle traffic into and out of the solution and anomaly detection, firmware management and S1SPs handler.
- PI-5: Operational reporting, readiness and testing issue work-off items.
- PI-6: Complete operational readiness and additional scope or rework.

65. The blueprint phase and DSP SI Design Assurance activities will confirm the integrity and completeness of the end-end design. This will involve deliverables that support the exit of blueprint being reviewed by the SI as part of a comprehensive end-to-end Design Assurance activity. Additionally, throughout blueprinting, the SI will be conducting Requirements Assurance to identify and propose mitigations for any gaps in the solution. All gaps are and will continue to be reviewed, assessed and governed under change management to resolve gaps in the design before blueprint exit.

66. To that end, DCC will assess the viability of the remaining implementation plan at CP4 (14 November 2025). DCC will confirm any changes to the plan to industry via the appropriate SEC Sub-Committees once the assessment is completed at the end of blueprint. DCC does not currently consider that this will result in material changes to the plan presented in this document.

2.7.2. Detailed Design, Build & PIT

67. Subject to direction from DESNZ, the approach to testing and test governance of the Future DSP will be described in a SEC Variation Testing Approach Document (SVTAD) for the DSP Programme (the 'DSP SVTAD'), which will be subject to a separate consultation. DCC is planning for this consultation to be conducted in November 2025, and a conclusions document will be issued to DESNZ by 26 February 2026. Therefore, the purpose of this section is to highlight the proposed testing Milestones for consultation rather than the approach which will be described in the SVTAD and the documents set out below.

68. The detailed Testing Approach will be documented in three artefacts: the Test Approach Document (TAD), the Migration Test Approach Document (MTAD), and the System Capacity Test Approach Document (SCTAD), each subject to SEC approval. All aspects of the Future DSP delivery will be subject to PIT, SIT and UIT. Detailed design, build and PIT is planned to take place in six PIs as set out above. The first four increments will build a fully functional Future DSP. No further code deliveries are anticipated in PI5 or PI6, so and therefore PIT testing is being planned for the initial four PIs only. PIT testing will therefore begin, with PI-1, commencing on 16 March 2026 and closing, by the designated governance body as advised by DESNZ, with PI-4 on 2 April 2027. Milestones for these activities have been added to the plan.

69. The remaining two PIs (PI-5 and PI-6) will focus on delivering work off items, operational readiness capabilities such as reporting, and allows for additive scope to be delivered in the event that an earlier PI was not completely successful or new additive scope is identified and agreed during delivery of PIs 1-4. Any defect fixes from earlier PIs delivered in PIs 5 or 6 will be deemed work off items, and will follow the governance process outlined in a TAD. It is not anticipated that any such item will materially impact the SIT timeline. Any unanticipated additions to scope will be discussed with DESNZ and the Testing Advisory Group (TAG), and included as either a variance to the scope described in the TAD, or in the case of a more substantive addition to scope, where feasible, deployed as an uplift, subject to an Impact Assessment and the relevant approvals. Impacts on the start of SIT for any late additions to scope resulting in the need for functional testing in PIs 5 or 6 would also need to be assessed.

70. DCC is assuming that PI-1 and PI-2 will be governed internally through Test Assurance Exit gates. PI-3 and PI-4 PIT exits will be governed by the Testing Advisory Board (TAB), while the PIT exit for the PI-4 will require approval of an exit decision from both the TAB and the SEC Panel on advice of the TAG. This exit decision at the end of PI-4 would be in respect of PIT testing undertaken in PIs 1-4. The overall framework for external governance will be set out in the SVTAD.

2.7.3. Systems Integration Testing

71. SIT testing for device migration and the SRG implementation are discussed in their respective sections of this document.

72. SIT is planned to commence once PI-4 PIT is complete and has successfully completed PIT exit TAB and TAG/Panel governance. A Pre-SIT phase has been planned as informal testing to ensure that SIT environment is ready to support SIT prior to the official start of the SIT phase.

73. DCC is planning on the basis that SIT exit will be governed by both TAB and TAG, which will then advise the SEC Panel to enable the Panel to make an exit decision. Formal exit will not be complete until the SEC Panel has approved the SIT exit report.

74. SIT testing will largely consist of an extensive end-to-end regression test, supplemented by testing end-to-end business processes and validating all integrations with the wider DCC ecosystem. The duration reflects the high degree of automation being planned and will use the Testing Automation Framework (TAF) capability owned by DCC. The SIT window is planned to run between 5 April 2027 following TAB approval for SIT commencement, and close on 22 July 2027. Milestones for these activities have been added to the plan.

75. A further consultation will be undertaken to allow feedback on the Device Selection Methodology (DSM) for DSP testing. The DSM will describe the criteria and rules used to determine the device types to be used in the SIT phase and will also be governed under the SVTAD. DCC is planning for this consultation to be conducted in February 2026, and a conclusions document will be issued to DESNZ by 10 April 2026. Milestones for these activities have been added to the plan.

2.7.4. System Capacity Testing

76. System Capacity Testing (SCT), which includes performance and capacity testing, will take place in PIT, with further SCT planned to take place in a new performance test environment which will form the basis for a future end-to-end performance testing environment which will support DCC changes on an ensuring basis. The final SCT window will open on 22 July 2027 and close on 21 October 2027. Before any SCT takes place, TAB and TAG governance will be used to approve the System Capacity Test Approach Document (SCTAD). TAB and TAG/Panel governance will be used to provide approval of an exit decision for SCT in the PIT environment. Milestones for these activities have been added to the plan.

77. The SCTAD will be developed and agreed with the TAG prior to commencement of system capacity testing.

2.7.5. User Integration Testing

78. UIT is planned to commence once SIT and device migration SIT exit has been approved by the SEC Panel informed by the TAG decision, and Pre-UTS testing to validate the environment build and application deployment has completed. The Future DSP will be available to test in the UIT-B environment for 12 weeks and the UIT-A environment for one week.[1] The UIT-B testing window will be open from 13 August 2027 to 5 November 2027. The UIT-A testing window will be open from 15 February 2028 to 21 February 2028. Pre-prepared migrated devices will be made available in the DCC Test Lab from day one of UIT. In addition, TPs can request DCC to facilitate migrations for other devices from the start of the UIT window, so that TPs can conduct comparative testing against As-Is and Future DSP functionality using the same device set if they should wish to do so. DCC will make available on request to TPs the list of device types that will be migrated. Milestones for these activities have been added to the plan.

79. UIT will be conducted against the supported versions of 'monolithic;' i.e. non-'modular' DUIS. There is no proposal to implement modular DUIS before completion of production device migrations onto the Future DSP.

80. It should be noted that customers will be able to make use of the UIT 'access bridge' which enables SUs to test in both UIT environments regardless of which UIT environment they are

[1] The UIT-A environment is the Production-like environment that almost all Test Participants have access to. The UIT-B environment is the development stream, but not all Test Participants have access to this environment.

connected to. To support the use of the access bridge, test devices, including migrated devices for UIT-A participants, will be set up in the UIT-B environment. DCC will engage with TPs to establish their device requirements for UIT testing well in advance of the UIT test windows.

81. It should be noted that TPs will need to have completed migration of UIT connections to DCC Connect and to the UIT SRG before commencing Future DSP UIT testing. DCC will engage with TPs via relevant governance bodies and other engagement channels to ensure that these requirements are understood. The process for migrating those connections is part of the DCC Connect and SRG activities set out earlier in Section 2.

82. DCC will use the process that will be used for device migrations in production to migrate existing UIT devices in the DCC test lab from the existing to the Future DSP ahead of the opening of the UIT window. This will enable TPs to begin testing the Future DSP from day one of the UIT test window. TPs will also be able to request migrations of their existing devices in the UIT environment from day one of the UIT window.

83. DCC will provide an opportunity to Install and Commission (I&C) new devices against both the existing and Future DSP systems in the UIT test window. This is to provide a simulation of the I&C cutover event planned for the production system. While the timelines are yet to be determined, it is anticipated that this will occur at least eight weeks before the end of the UIT testing window. This will be confirmed at CP5.

84. DCC has also considered whether UIT for Future DSP should be mandated and will be in ongoing dialogue with SUs and stakeholders on this topic. DCC's current view is that some Mandatory User Testing will be required for Future DSP within a defined testing window, due to the criticality of the Future DSP and the potential operational risk associated with the migration. If required, DCC anticipates that the process for this mandate will be set out in the DSP SVTAD following consultation with industry on this topic. DCC is planning for this consultation to be conducted in November 2025, and a conclusions document will be issued to DESNZ by 26 February 2026.

Q3	Do you agree with the proposed Milestones for UIT testing for Future DSP and that there should be a mandatory component to UIT testing? *Please provide a rationale for your response.*

2.8. Go-Live

85. BAT will be carried out to validate the end-end operational processes that will support the service Go-Live for Future DSP. This will begin on 8 November 2027 and conclude on 17 December 2027, via approval from the DCC Service Acceptance Team.

86. Go-Live of the Future DSP and commencement of device migration will be subject to LSC governance, details of which will be set out by DESNZ. This LSC decision will cover both the Go-Live for the Future DSP and the beginning of device migration, with a short gap between the two points. This plan assumes that this process will be similar in nature to previous programmes and will require assessment by the SEC Panel Sub-Committees and a recommendation from the SEC Panel prior to a DESNZ determination. The plan sets out that the LSC document will be issued to DESNZ and SEC Panel for consideration on 10 January 2028 and that the conclusion of service acceptance activities and subsequent Go-Live decision will take place on 21 February 2028.

87. The Go-Live for the Future DSP will be 22 February 2028. Milestones for these activities have been added to the plan.

88. There is an assumption that there will be only one Go-Live required for Future DSP. DCC will continue to monitor this and will provide a further update at CP4.

Q4	Do you agree with the proposed Milestones for LSC, including that there should not be a LSC decision for the cutover to DCC Connect? *Please provide a rationale for your response.*

2.9. Device Migration

89. The Section sets out the approach to the design, testing and delivery of device migration to the Future DSP.

2.9.1. Device Migration Design

90. The design for device migration will form part of Technical Migration Approach Document (TMAD). The drafting of this document is expected to be completed by Q1 2026 and will be shared with SUs and TPs as appropriate. This document will include the end-to-end process for device migration for both SMETS1 and SMETS2 devices. The rules for device migration will be developed and consulted on as appropriate.

91. DCC anticipates that testing of the migration solution, including testing negative/ exception scenarios, will take place throughout the SIT phases. More detail on the proposed approach to SIT testing for device migration is provided below. The device migration SIT window will be from 5 May 2027 to 6 August 2027. A Migration Test Approach Document (MTAD) will be governed by the SVTAD and developed and approved by TAG ahead of commencing migration testing. Milestones for these activities have been added to the plan.

2.9.2. Device Migration Solution

92. Device migration of SMETS2 devices involves the replacement of up to two keys on each device (ACB key and ACB KAK keys). Once the keys are replaced, control of the device will switch from the As-Is DSP to the Future DSP. The SRG will route messages to and from the correct DSP based on a routing table which will be updated as devices are migrated.

93. A device migration solution for SMETS2 devices will be developed based on the ECoS migration solution which also involved rotating keys on all SMETS2 devices. This will include a DCSE and scheduling capability as well as capability to update the keys. A device migration rollback will be included to support rolling back meters to the As-Is DSP in the unlikely event that an error has been detected.

94. SMETS1 meters are supported by S1SPs. For each S1SP they store and use a single ACB key. The migration of SMETS1 meters will be migrated one S1SP at a time. More detail on this approach will be set out in the device migration consultation.

2.9.3. Migration of Devices

95. Device migration is planned to take place between 3 March 2028 and 15 December 2028. This duration is based on a slow ramp-up of migrations, followed by a sustained volume migration. DCC has sized this window based on the peak sustainable migration achieved during ECoS migration. Milestones for these activities have been added to the plan.

96. We anticipate that device migration will be controlled by DCC and will be run in a similar way to the recent ECoS migration, and that there is no requirement for SUs to be actively involved in this.

97. The detailed approach and sequencing for device migration will be set out by DCC in the TMAD consultation with industry.

98. DCC proposes to use similar reporting to that provided under the EcoS Migration Reporting Scheme to ensure industry has visibility throughout the migration. DCC is currently reviewing the format to ensure it includes content such as detail on successful and unsuccessful migrations, new installs, and gaining Suppliers. Once the format has been established, DCC will consult with

industry to determine views in a timeframe that allows comments on the TMAD to be considered and properly reflected into the final reporting format.

Q5	Do you agree with the proposed Milestones for device migration? *Please provide a rationale for your response.*

2.10. Movement of Install & Commission

99. I&C is a vital service, and sufficient testing will be required to ensure this service will not be impacted during device migration. The Future DSP will be delivered with a capacity test environment which will be utilised during as part of regulated testing. The As-Is DSP does not prioritise messages while the Future DSP has this capability which will help manage capacity peaks.

100. Initially, after the Future DSP goes live, I&C will continue to happen against the As-Is DSP. DCC is proposing that this is moved to the Future DSP part way through migration when there should be sufficient confidence in the performance of the Future DSP to move I&C. This is facilitated by transfer of the Manufacturing Pack private keys from the As-Is to the Future DSP. This will take place by 29 October 2028, with remaining keys (e.g. Operational Keys) being transferred by the end of device migration on 17 December 2028.

101. Transfer of I&C will be subject to LSC governance, details of which will be set out by DESNZ. This LSC decision will cover both the transfer of the Manufacturing Pack private keys from the As-Is to the Future DSP and the transfer of the remaining keys by the end of device migration. This plan assumes that this process will be similar in nature to previous programmes and will require assessment by the SEC Panel Sub-Committees and a recommendation from the SEC Panel prior to a DESNZ determination. The plan sets out that the LSC document will be issued to DESNZ and SEC Panel for consideration on 11 September 2028 and that the conclusion of service acceptance activities and subsequent Go-Live decision will take place on 29 October 2028. Milestones for these activities have been added to the plan.

2.11. Decommissioning of the As-Is DSP

102. Following cutover of SPs and SUs onto the SRG, and migration of devices onto the Future DSP, the hardware, software and data currently used by the As-Is DSP will need to be decommissioned in a secure and orderly manner. The decommissioning process includes removal and, where required, secure destruction of hardware, software and data. The exit process and delivery will be subject to intensive monitoring and reporting by appropriate governance, including SEC Panel, SSC and other SEC Sub-Committees as required.

103. Before decommissioning commences, the remaining private keys held by the As-Is DSP will be transferred to the Future DSP. This will ensure that it can communicate with any devices which have not been successfully migrated to the Future DSP should they become contactable in the future. Further detail on how this process will work will be provided via an updated plan for decommissioning at CP4.

104. Early planning for exit and decommissioning has commenced with the formation of a dedicated cross functional programme workstream. Engagement with the Incumbent DSP provider at a commercial level commenced in Q2 2025, focused on defining and agreeing the detail of our collaborative approach to exit and decommissioning in accordance with the 2013 Incumbent DSP contract.

105. Exit Managers are now in place for both DCC and the Incumbent DSP provider. DCC will establish a formal Exit Board as defined within the Incumbent DSP contract early in Q3 2025.

106. The exit and decommissioning plan will align directly with the plans for transition to DCC Connect in 2026, and device migration to the Future DSP in 2028. This plan will include the contractual activities and mechanisms to exit the Incumbent DSP contract at minimum cost and the practical activities required to securely decommission all elements of the As-Is DSP platform and services.

107. The impact to customers of decommissioning the As-Is DSP is expected to be minimal and will principally focus on the removal and secure disposal of redundant Gamma connectivity hardware following transition to DCC Connect. Final decommissioning activity following device migration is expected to have no impact on customers. DCC will then write to SEC Parties and the SEC Panel to formally confirm that this is complete.

2.12. Regulatory change

108. The DSP Programme will require several regulatory consultations to support its delivery. DCC will shortly issue a SEC consultation later in 2025 to support the cutover of SUs' and TPs' DCC Gateway Connections to the DCC Connect network, as well as the enduring arrangements for DCC Connect. DCC plans to issue its conclusions on the SEC changes required for the DCC Connect in January 2026 and anticipates the redesignation of the NETMAD shortly thereafter to enable ordering to commence.

109. DCC is still assessing the scope of regulatory changes for other programme deliverables as we move through the design phase. However, we consider further regulatory consultations will be required to support the delivery of the following elements of the programme. Milestones for the confirmation of regulatory change (the latest date by which regulatory conclusions will be submitted to DESNZ) have been included in the plan where the timelines for regulatory consultations are known.

- The DSP SVTAD: DCC intends to consult, subject to direction from DESNZ, on the governance approach to PIT, SIT and UIT. This would be set out in the DSP SVTAD, which would be subject to a consultation. DCC is planning for this consultation to be conducted in November 2025, and a conclusions document will be issued to DESNZ by 26 February 2026.
- Device Selection Methodology: DCC intends to consult on the DSM as part of the testing approach. The DSM will describe the criteria and rules used to determine the device types to be used in the SIT phase and will also be governed under the SVTAD. DCC is planning for this consultation to be conducted in February 2026, and a conclusions document will be issued to DESNZ by 10 April 2026.
- SRG: DCC intends to consult on the regulatory requirements and changes associated with SUs and TPs moving to communicate via the SRG. The consultation will include information on the changes required by SUs and TPs. It will also include information on the timelines for these changes. DCC is planning for this consultation to be conducted in April 2026, and a conclusions document will be issued to DESNZ by 14 August 2026.
- DCCKI SEC Changes: DCC intends to consult on implementing the DCCKI Document Set for DCCKI2 both in Test and Production. DCC is planning for this consultation to be conducted in July 2026, and a conclusions document will be issued to DESNZ by 9 October 2026.
- Enduring changes for the Future DSP: DCC intends to consult on the regulatory changes required to deliver the Future DSP solution. This excludes Modular DUIS which will be subject to a separate consultation. DCC is planning for this consultation to be conducted in August 2027, and a conclusions document will be issued to DESNZ by 30 September 2027.
- Device Migration: DCC intends to consult on the detailed approach and sequencing for device migration will be subject to a separate consultation with industry with dates to be confirmed at CP4.

- Modular DUIS: DCC intends to consult on the changes required to implement modular DUIS on the Future DSP. The timelines for this regulatory consultation will be confirmed at CP6 to align with the existing Milestone for this activity.

110. Each consultation will be underpinned by customer engagement (see Section 2.13 below), and we will gather views from the relevant Sub-Committees and hold industry workshops ahead of each consultation where appropriate.

2.13. Customer journey and key engagement milestones

111. Customer engagement has been a key programme activity for DCC to foster collaborative relationships with our stakeholders. DCC is committed to taking a customer-centric approach to deliver the DSP programme. Effective engagement to date has shaped the programme and its procurement, with customers identifying their four priority business needs that the Future DSP must deliver. These are (i) value for money; (ii) service continuity; (iii) service improvement and flexibility; and (iv) SEC and REC compliance. The DCC will be continuing engagement through the relevant SEC forums, where technical, operational, security and testing decisions will be shaped directly with customers.

112. DCC has set out a comprehensive engagement approach to support ongoing programme activities as we move on from Mobilisation into the Design, Build and Test phases, and onto DSP Go-Live.

113. The table below sets out DCC's planned engagement with stakeholder governance bodies during the delivery of the plan up until Go-Live in Q1 2028. The engagement approach is designed based on the Programme Assurance Policy, and the table below provides a high-level indication of the types of things which will be shared with industry, it is non-exhaustive and DCC will flex to meet the needs and interests of our customers wherever possible. These activities are potentially subject to change.

Governance Body	Engagement Activity	Objective	Date
SEC Panel	• SEC Panel Support for DSP Go-Live	Decision	Q1 2028
	• LSCs Governance	Decision	TBC
	• DCC Connect HIMW Approvals	Decision	Q3/4 2025
	• PIT and SIT Exit	Decision	Q2 2027
	• SRG SIT Exit	Decision	Q4 2026 – Q3 2027
TABASC	• Design and Build Updates	Discussion/ Information	Q4 2025 – Q4 2027
	• Future DSP	Discussion/ Information	Q2 2025 – Q4 2025
	• Blueprint Design	Discussion/ Information	Q4 2025
OPSG	• Operational Readiness Updates	Information	Q4 2025 – Q4 2027
	• SU Installation, Cutover and impacts	Information	Q1 2026 – Q3 2026
	• Migration and Cutover	Discussion	Q4 2027 – Q1 2028
	• LSCs Governance	Decision	Q2 2027 – Q4 2028
TAG	• Testing Updates	Information	Q1 2026 – Q4 2027
	• PIT and SIT Exit	Recommendation	Q2 2027
	• SRG SIT Exit	Recommendation	Q4 2026 – Q3 2027
	• Go-Live Governance	Decision	Q4 2027 – Q1 2028

Governance Body	Engagement Activity	Objective	Date
SSC	• Security Information and Assurance Updates	Information	Q4 2025 – Q4 2027
	• Go-Live Governance	Decision	Q4 2027 – Q1 2028
SMKI PMA	• Smart Meter Key Infrastructure Updates	Information	Q3 2025 – Q4 2027
	• DCCKI2	Decision	Q3 2026
	• Supporting LSC decisions that enable private key transfer	Decision	Q3/ Q4 2028
Small Suppliers	• Design and Build Updates	Information	Q3 2025 – Q4 2027
	• Migration and Cutover	Information	TBC
	• UIT and SIT updates	Information	Q4 2026 – Q3 2027
Wider Industry Consultations	• Revised Delivery Plan	Input	Q3 2025
	• DCC Connect Consultation	Input	Q3 2025
	• SRG Consultation	Input	Q1 2026
	• DCCKI2 Consultation	Information	As required, in advance of consultation period.
Service Enablement Engagement	• Service enablement engagement with SEC Parties as required including support to New Users	Information	Q1 2028 onwards

3. Dependencies & Assumptions

114. The following section sets out DCC's current view of dependencies and assumptions on the DSP Programme, which have informed this consultation. The list is not comprehensive.

#	Type	Description
A1	Assumption	This LC13B plan is based on the premise that there will be no material changes arising from the various regulatory consultations supporting this programme, resulting in changes to the plan.
A2	Assumption	DESNZ will require LSC processes that are similar to previous programmes for the DSP Go-Live and SRG Go-Live but not DCC Connect Go-Live.
A3	Assumption	There is an assumption that the LSC Go-Live decision for SRG will also cover the Go-Live of DCCKI2. DCC will continue to monitor this and will provide a further update at CP4.
D1	Dependency	On SUs: That they provide timely order data for DCC Connect orders to enable a smooth cutover.
D2	Dependency	On SUs: That they provide timely and effective support and help facilitate the installations of DCC Connect circuits and network termination equipment.

#	Type	Description
D3	Dependency	On SUs and TPs: That they provide timely and effective support and help facilitate the cutover from GAMMA to DCC Connect and the subsequent decommissioning of GAMMA hardware located at their sites. This includes support and impacts from HIMW during the cutover.
D4	Dependency	On SUs: That they provide timely and effective support to facilitate the cutover to SRG. This needs to complete before device migration can commence.
D5	Dependency	On SUs and TPs: To participate in testing activities such as UIT, DCC is proposing that some elements of UIT are mandatory.
D6	Dependency	On SUs and TPs: To participate in testing activities such as UIT, DCC is proposing that SUs cutover to the Future DSP's SRG UIT test environment.
D7	Dependency	On DESNZ: That it designates the SEC changes associated with the DSP programme in a timely manner.
D8	Dependency	On DESNZ: That it provides a positive Go-Live decision for service Go-Lives across the DSP programme in a timely manner.
D9	Dependency	On DESNZ: That it defines LSC and associated governance approach in a timely manner.
D10	Dependency	On SEC Panel/ Sub- Committees: SSC approval of CIO reports to support LSC.
D11	Dependency	On SEC Panel/ Sub- Committees: TAG to advise and Panel to review and approve PIT and SIT exit.
D12	Dependency	On SEC Panel/ Sub- Committees: That SEC Sub-Committees will review DCC LSC submissions and make a recommendation to SEC Panel in relation to Go-Live of SRG and DSP in a timely manner.
D13	Dependency	On SEC Panel/ Sub- Committees: That SEC Panel will make a recommendation to DESNZ in relation to Go-Live of SRG and DSP in a timely manner.
D14	Dependency	On SPs/ Suppliers: That they provide timely and effective support to facilitate the cutover to DCC Connect. These activities need to be complete to ensure there is no delay to later elements of the plan. This includes support and impacts from HIMW during the cutover.

4. Risks & Opportunities

115. The following section highlights some of the key risks to and opportunities around the delivery of the DSP Programme.

4.1. Risks

#	Risk	Impact	Management Strategy
R1	There is a risk that SUs and TPs do not meet the dependencies set out in this plan. Specifically, cutover to DCC Connect and cutover onto the SRG are pre-	There is the potential for delays beyond the cutover and migration windows set out in this plan, which may lead to a delay in the Go-Live of the Future	Clear DCC and SU Points of Contact (PoCs) established to facilitate planning and execution of cutovers and migrations. Engagement with SUs and TPs to ensure issues can be identified and mitigated early.

#	Risk	Impact	Management Strategy
	requisites for the Future DSP to Go-Live and device migrations to commence, and Testing activities specifically UIT.	DSP. This will result in significantly increased costs of the programme due to an extended dual-running period.	Delivery of the SRG ahead of DSP Go-Live will give more time and flexibility for cutover onto SRG. This will in turn allow more time for the device migration after DSP Go-Live.
R2	There is a risk that the blueprint phase identifies changes to the design that must be included in the programme, which may then extend the implementation timelines.	There is the potential for delay to implementation of the Future DSP, which will increase costs of the programme as the programme extends, and the decommissioning of the As-Is DSP is delayed.	Contingency has been allowed for in the implementation plan for change. A robust change management process is in place to ensure potential change is properly assessed. .
R3	There is a risk that SEC Modification changes to the As-Is DSP are made during implementation phases of the DSP programme.	There is the potential for delay to implementation of the Future DSP, which will increase costs of the programme as the programme extends, and the decommissioning of the As-Is DSP is delayed.	SEC Modification changes that impact DSP during the design, build and test phase will be impact assessed against the Future DSP to determine if it will cause a delay to the plan and also whether changes could be applicable to a further, Future DSP release. A decision will be taken, as part of the modification process, by the appropriate governance groups, as to whether the change is urgent enough to require incorporation into the programme in-flight. DCC will also continue to monitor SEC Modifications throughout the cutover/ migration, testing and decommissioning processes for early identification of related risks and issues.

4.2. Opportunities

#	Opportunity	Impact	Strategy to Deliver
O1	There is an opportunity to make savings against the contingency costs and other costs should the blueprint phase identify fewer changes than allowed for, which also has the potential to reduce the implementation timelines.	Lower costs and reduced implementation timelines.	Change control process to ensure only those changes which are necessary or which reduce costs / risk are taken forward.

5. Next steps

116. Following the closure of this consultation, DCC will assess respondents' views and amend the draft plan as required. DCC will then submit an amended version of this plan to the Department that it considers suitable for approval.

117. DCC is aiming to provide a report to the Department by no later than 31 October 2025. This report will contain DCC's consideration of the responses to this consultation as well as the

proposed updated plan and the proposed revised date for the designation of the enduring SEC changes. DCC will publish its conclusions document on its website.

118. Following the Department's decision on this plan, DCC will initiate a request with the IMF to add, amend or remove the relevant milestones on the Joint Industry Plan (JIP).

6. Consultation questions and how to respond

119. We are seeking your views on the questions set out in this document:

Q1	Do you agree with the proposed Milestones for the DCC connect cutover and associated dependencies on SUs and TPs? *Please provide a rationale for your response.*
Q2	Do you agree with the proposed Milestones for the cutover onto the SRG and associated dependencies on SUs? *Please provide a rationale for your response.*
Q3	Do you agree with the proposed Milestones for UIT testing for Future DSP and that there should be a mandatory component to UIT testing? *Please provide a rationale for your response.*
Q4	Do you agree with the proposed Milestones for LSC, including that there should not be a LSC decision for the cutover to DCC Connect?? *Please provide a rationale for your response.*
Q5	Do you agree with the proposed Milestones for device migration? *Please provide a rationale for your response.*
Q6	Do you consider there to be any additional Milestones needed that are missing from this revised plan? *Please provide a rationale for your response.*
Q7	Do you have any other comments on this plan and the engagement approach? *Please provide a rationale for your response.*

120. Please provide responses using the attached response form by **17:00 on 3 October 2025** to DCC at consultations@smartdcc.co.uk.

121. Consultation responses may be published on our website (smartdcc.co.uk). Please state clearly in writing whether you want all or any part of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department and the Gas and Electricity Markets Authority (the Authority). Information provided to the Department or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If the Department or the Authority receive a request for disclosure of the information, we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that

confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

122. If you have any questions about this consultation, please contact us at consultations@smartdcc.co.uk.

7. Attachments

123. This consultation includes one attachment:

Attachment 1: Consultation response form

Appendix A – DSP delivery plan Milestones

This table summarises the proposed Milestones for the DSP Programme described in Section 2 of this document. Due to developments in the programme design and understanding, all Milestones are new with the labelling for previous Milestones from the earlier LC13B consultation now obsolete.

#	DSP Milestone	Description	Date
1	**Future DSP – Control Point 4 (Blueprint Complete)**	Date by which DCC will confirm whether a further LC13B consultation is required to update future Milestones. If applicable, a request for an LC13B direction will be made to DESNZ. The blueprint phase completes the high-level design of the Core DSP Solution.	14/11/25
2	**DCC Connect – Confirmation of Regulatory Change**	Latest date by which DCC will issue a conclusions document following consultation on the proposed transitional and enduring changes needed to SEC subsidiary documents for DCC Connect along with conclusions on plans for implementation of those SEC changes.	12/01/26
3	**DCC Connect – Order Confirmation Begins**	Earliest date by which DCC can begin confirming orders for the DCC Connect service from SUs and TPs (DCC can accept orders once the NETMAD has been designated).	26/01/26
4	**Future DSP – Confirmation of Testing Approach**	Latest date by which DCC will issue a conclusions document following consultation on the proposed DSP SVTAD.	26/02/26
5	**Future DSP – PIT Execution Window Opens**	Latest date by which PIT testing of Programme Increment 1 commences.	16/03/26
6	**DCC Connect – Go-Live and Service User Cutover Window Begins**	Latest date by when the cutover of SUs' existing DCC Gateway Connections to the DCC Connect service can commence, and new SUs' DCC Connect connections can Go-Live. This is also the latest date by when the cutover of TPs from Gamma to the DCC Connect service can commence.	25/03/26
7	**Future DSP – Confirmation of Device Selection Methodology**	Latest date by which DCC will issue a conclusions document following consultation on the proposed DSM.	10/04/26
8	**SRG – Confirmation of Regulatory Change**	Latest date by which DCC will issue a conclusions document following consultation on the proposed transitional and enduring changes needed to SEC subsidiary documents for the SRG (Test and Production environments) along with conclusions on plans for implementation of those SEC changes.	14/08/26
9	**SRG – Confirmation of DCCKI SEC Change**	Latest date by which DCC will issue a conclusions document following consultation on the proposed DCCKI changes (Test and Production environments) needed to SEC subsidiary documents for SRG along with conclusions on plans for implementation of those SEC changes.	09/10/26
10	**Future DSP – Control Point 5 (PI-4 Build Complete)**	Latest date by which DCC will confirm whether a further LC13B consultation is required to update future Milestones for Future DSP. If applicable, a request will be made to DESNZ. This Milestone aligns with the end of build for Programme Increment 4, at which point the functional development of the Future DSP will have been completed.	04/12/26

#	DSP Milestone	Description	Date
11	**SRG – SIT Execution Window Opens**	Latest date by which SIT starts for the SRG.	15/03/27
12	**DCC Connect – Service User Cutover Window Closes**	Latest date by which DCC requires all SUs to have completed the cutover of existing DCC Gateway Connections to the DCC Connect service. This is also the latest date by which DCC requires TPs to have completed cutover from Gamma to the DCC Connect service.	30/03/27
13	**Future DSP – PIT Execution Window Closes**	Latest date by which a PIT completion decision for Programme Increments 1-4 is made by the designated governance body as advised by DESNZ.	02/04/27
14	**Future DSP – SIT Execution Window Opens**	Latest date by which SIT starts for Programme Increments 1-4.	05/04/27
15	**SRG – SIT Execution Window Closes**	Latest date by which a SIT completion decision for the SRG is made by the designated governance body as advised by DESNZ.	30/04/27
16	**SRG – UIT Testing Window Opens**	Latest date by which TPs can commence testing in the UIT environment for the SRG.	03/05/27
17	**Future DSP – Device Migration SIT Window Opens**	Latest date by which SIT starts for device migration.	05/05/27
18	**SRG – UIT Testing Window Closes**	Latest date by which TP testing completes in the UIT environment for the SRG.	28/05/27
19	**SRG – LSC Go-Live Submission**	Latest date by which DCC will submit its LSC submission in relation to the Production SRG Go-Live to DESNZ and SEC Panel. This LSC document will cover the Go-Live for the SRG in Production, the Go-Live of the new DCCKI Certification Authority (DCCKI2) in Production, and the beginning of cutover of SUs to the SRG in Production, with short gaps between these points.	10/07/27
20	**Future DSP – Final System Capacity Test Window Open**	Latest date by which the final System Capacity Test window will open for all Programme Increments.	22/07/27
21	**Future DSP – SIT Execution Window Closes**	Latest date by which a SIT completion decision for all Programme Increments is made by the designated governance body as advised by DESNZ.	22/07/27
22	**Future DSP – Device Migration SIT Window Closes**	Latest date by which a SIT completion decision for all Programme Increments is made by the designated governance body as advised by DESNZ.	06/08/27
23	**Future DSP – UIT-B Testing Window Opens**	Latest date by which TP testing starts in the UIT-B environment for the Future DSP.	13/08/27
24	**SRG – LSC Go-Live Decision**	Latest date by which DCC will receive a response from DESNZ on the LSC following SEC Panel recommendation. A positive response will take the form of designation of the enduring updates to the SEC, which enables the changes to Live systems for the SRG. This LSC decision will cover the Go-Live in	23/08/27

#	DSP Milestone	Description	Date
		production for the SRG, the new DCCKI Certification Authority (DCCKI2), and the beginning of cutover of SUs to the SRG, with short gaps between these points.	
25	**SRG – Go-Live**	Latest date by which production capabilities are live and ready so that start of cutover of SUs to the SRG can commence.	25/08/27
26	**Future DSP –Control Point 6 (Modular DUIS)**	DCC to confirm whether a further LC13B consultation is required to update future milestones for Modular DUIS, and whether any regulatory changes would be required for this. If applicable, a request will be made to DESNZ.	30/08/27
27	**SRG – Service User Cutover Window Opens**	Latest date by which the cutover of SUs to the SRG can commence.	01/09/27
28	**Future DSP – Confirmation of Regulatory Change**	Latest date by which DCC will issue a conclusions document following consultation on the proposed transitional and enduring changes needed to SEC subsidiary documents for Future DSP along with conclusions on plans for implementation of those SEC changes. This excludes Modular DUIS which will be subject to a separate consultation.	30/09/27
29	**Future DSP – Final System Capacity Test Window Closes**	Latest date by which the final System Capacity Test completion decision will be made for all Programme Increments by the designated governance body as advised by DESNZ.	21/10/27
30	**Future DSP – UIT-B Testing Window Closes**	Latest date by which the TP testing window in the UIT-B environment will close.	05/11/27
31	**Future DSP – BAT Testing Window Opens**	Latest date by which BAT will commence for the Future DSP.	08/11/27
32	**Future DSP – BAT Testing Window Closes**	Latest date by which BAT will close following acceptance by the DCC Service Acceptance Team.	17/12/27
33	**Future DSP – LSC Go-Live Submission**	Latest date by which DCC will issue its LSC submission in relation to Future DSP Go-Live to DESNZ and SEC Panel.	10/01/28
34	**SRG – Service User Cutover Window Closes**	Latest date by which DCC requires all SUs to have completed the cutover to the SRG.	15/01/28
35	**Future DSP – UIT-A Test Window Opens**	Latest date by which TP testing starts in the UIT-A environment.	15/02/28
36	**Future DSP – UIT-A Test Window Closes**	Latest date by which the TP testing window in the UIT-A environment will close.	21/02/28
37	**Future DSP – LSC Go-Live Decision**	Latest date by which DCC will receive a response from DESNZ on the LSC following SEC Panel recommendation. A positive response will take the form	21/02/28

#	DSP Milestone	Description	Date
		of designation of the enduring updates to the SEC, which enables the changes to Live systems for Future DSP.	
38	**Future DSP – Go-Live**	Latest date by which capabilities are live and ready to start migration and operation of devices on the Future DSP.	22/02/28
39	**Future DSP – Device Migration Commences**	Latest date by which migration capability will be available for DCC to begin migration of devices from As-Is to the Future DSP.	03/03/28
40	**Future DSP – LSC Go-Live Submission for Transfer of I&C and Remaining Private Keys**	Latest date by which DCC will issue its LSC submission in relation to I&C Go-Live on the Future DSP to DESNZ and SEC Panel.	11/09/28
41	**Future DSP – LSC Go-Live Decision for Transfer of I&C and Remaining Private Keys**	Latest date by which DCC will receive a response from DESNZ on the LSC following SEC Panel Recommendation. A positive response will take the form of designation of the enduring updates to the SEC, which enables the transfer of I&C to the Future DSP and other private keys.	29/10/28
42	**Future DSP – Transition of I&C from As-Is to Future DSP**	Latest date by which I&C service request processing and the associated manufacturing pack private keys have been transferred from As-Is to Future DSP.	30/10/28
43	**Future DSP – Device Migration Complete**	Latest date by which all devices will have been migrated to the Future DSP.	15/12/28
44	**Future DSP – Transfer of Remaining Private Keys**	Latest date by which all remaining private keys have been transferred from As-Is to Future DSP.	17/12/28

Appendix B – DSP delivery plan-on-a-page

This plan-on-a-page POAP summarises the proposed Milestones for the DSP Programme described in Section 2 of this document. The numbers on this plan correspond to the list of milestones in Appendix A of this document.